

# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218 www.deq.virginia.gov

David K. Paylor Director

(804) 698-4000 1-800-592-5482

Molly Joseph Ward Secretary of Natural Resources

**MEMORANDUM** 

TO: Regional Directors:

Regional Air Compliance Managers;

Central Office Air Managers;

CC: James Golden, Director for Operations

Michael Dowd, Director, Air and Renewable Energy Division  $\,\mathcal{M}^{\,\zeta}\, \mathcal{Q}\,$ FROM:

SUBJECT: ASOP-05: Procedures for Vapor Tightness Testing Certification,

Monitoring, and Tester Approval for Gasoline Tank Trucks And

Account Trucks in Accordance with 9 VAC 5-40-5220 G

DATE: May 26, 2017

## Purpose/Applicability

The purpose of this procedure is to address regulatory requirements for procedures for testing and for DEQ approval of testers for gasoline tank trucks/account trucks subject to Rule 4-37<sup>1</sup>. This is to ensure qualified persons are conducting or directing the vapor tightness testing certification and the proper procedures are followed for conducting and reporting the tests as required under 9VAC5-40-5220 G (as follows):

- 1. No owner or other person shall use or permit the use of any tank truck or account truck that is loaded or unloaded at facilities subject to the provisions of subsection C, D or E<sup>2</sup> of this section unless such truck is designed, maintained and certified to be vapor tight<sup>3</sup>.
- 6. Testing to determine compliance with subdivision 1 of this subsection shall be conducted and reported and data shall be reduced as set forth in procedures approved by the board using test methods specified there. All tests shall be conducted by, or under the direction of, a person qualified by training or experience in the field of air pollution testing, or tank truck maintenance and testing and approved by the board. [emphasis added]

http://www.deg.virginia.gov/Portals/0/DEQ/Air/Regulations/437.pdf

http://law.lis.virginia.gov/admincode/title9/agency5/chapter40/section5220/

<sup>3</sup> http://law.lis.virginia.gov/admincode/title9/agency5/chapter40/section5210/

DEQ is delegated the authority to approve test method procedures and qualified testers under 9 VAC 5-40-5220 G 6.

This procedure encompasses DEQ approved procedures for vapor tightness testing certification, monitoring for continuing existence of VOC leak tight conditions, and the proper display of vapor tightness certification information on the tanks of the gasoline tank and account trucks subject to 9VAC5-40-5220 G.

As required under 9VAC5-40-5220 G 6, G 7, G 8, and G 9, DEQ, finds acceptable, the following test methods, procedures and proper certification display as presented in this document under III.A, III.B, IV.A, and V.

Except where defined in this document, all remaining applicable requirements not discussed in this procedure shall be complied with as according to 9VAC5-40-5220 G.

## II. Definitions

All terms used have the meanings provided in 9 VAC 5 Chapter 40 Part II Article 37 ("Rule 4-37") and 40 CFR, Part 60, Appendix A, Method 27 ("Method 27"). For the purposes of this procedure for 9VAC5-40-5220 G 6, tank trucks/account trucks shall be considered gasoline delivery tank trucks. "Delivery tank" is defined under section 3.4 of Method 27.

## III. Testing Requirements and Methods

- A. **Vapor tightness testing:** Vapor tightness testing required by 9VAC5-40-5220 G 6 and G 8 shall be conducted in accordance with Method 27. This is consistent with Air Quality Program Policies and Procedures (AQP-1)<sup>6</sup>, Section II.B.5.a. This method and the test form under Attachment 1 is written generically to allow application of the test to meet various standards in addition to the standards under Rule 4-37, such as NSPS XX<sup>7</sup>, MACT R<sup>8</sup>, and MACT 6B<sup>9</sup>. To meet requirements of Rule 4-37, variables left undefined in the method shall have the meanings provided below (presented consistent with the section numbers in the method).
  - 3.1 Allowable pressure change ( $\Delta p$  or "delta" p) is no more than 3 inH<sub>2</sub>0 or 76 mmH<sub>2</sub>0.
  - 3.2 Allowable vacuum change ( $\Delta v$  or "delta" v) is no more than 3 inH<sub>2</sub>0 or 76 mmH<sub>2</sub>0.
  - 3.6 27.6 kilopascals is equivalent to 4 lbs/in<sup>2</sup>.
  - 3.7 Initial pressure  $(P_i)$  is no less than 18 inH<sub>2</sub>0 or 460 mm H<sub>2</sub>0, gauge
  - 3.8 Initial vacuum ( $V_i$ ) is no less than 6 inH<sub>2</sub>0 or 150 mmH<sub>2</sub>0, gauge
  - 3.9 Time period (t) is no less than 5 minutes.
  - 16.2 Administrator is DEQ.

<sup>&</sup>lt;sup>5</sup> https://www3.epa.gov/ttn/emc/promgate/m-27.pdf

<sup>6</sup>http://townhall.virginia.gov/L/GetFile.cfm?File=C:\TownHall\docroot\GuidanceDocs\440\GDoc DEQ 2225 v1.pdf

http://www.ecfr.gov/cgi-bin/text-idx?SID=e6d537cda1ecfc04c35142574ac617d8&mc=true&node=sp40.8.60.xx&rgn=div6

http://www.ecfr.gov/cgi-bin/text-idx?SID=e6d537cda1ecfc04c35142574ac617d8&mc=true&node=sp40.11.63.r&rgn=div6 http://www.ecfr.gov/cgi-bin/text-

idx?SID=e9b399e77708dead36e3654e1dd273db&mc=true&node=sp40.16.63.bbbbbb&rgn=div6

B. Leak tightness monitoring: Monitoring to confirm the continuing existence of leak tight conditions required by 9VAC5-40-5220 G 7<sup>10</sup> shall be conducted using the test method specified in Appendix B of EPA-450/2-78-051 "Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems"<sup>11</sup>. (Note: Leak detection tests/Monitoring for leakage is performed as well with MACT R and NSPS XX except EPA Method 21<sup>12</sup> is used.)

# IV. Documentation

- A. **Proper Display of Delivery Tank Certification** information as required by 9VAC5-40-5220 G 9<sup>13</sup> for each gasoline tank shall be displayed as follows:
  - 1. Each delivery tank shall have information displayed indicating the tank is certified vapor tight.
  - 2. The information shall contain the letters VR followed by the month and year of the certification expiration date with dashes in between.

Example: VR-04-17 would be for a test conducted in April 2016 and expiring in April 2017.

- 3. The information shall be displayed using stenciled letters or equivalent that are at least 2" high and are in a contrasting color to that of the tank.
- 4. The information shall be displayed on each side of the delivery tank at the widest (largest diameter) point, or as close as possible to be clearly visible, as near to the front end of the delivery tank as possible.
- 5. If there are other markers or informational displays in the above mentioned location, then the information required by this procedure shall be placed on the same line of the existing information toward the rear of the tanker.
- 6. The information shall be maintained in a clean and legible condition at all times.
- B. The owner of a vapor tightness testing facility shall maintain records for all delivery tanks tested, including at a minimum the following applicable information:

(Attachment 2 may be used for 1-4)

- 1. The name and address of the delivery tank owner.
- 2. The name and address of the delivery tank carrier.
- 3. The delivery tank identification number.
- 4. The date(s) of the test, repair, and retest.

(Attachment 1 shall be used for 5)

- 5. Raw test data demonstrating certification including but not limited to:
  - a. The first and second passing, consecutive, differential test pressure results, and their average (as tested under pressure).
  - b. The first and second passing, consecutive, differential test vacuum results, and their average (as tested under vacuum).
  - c. Name and title of person conducting the test.
- C. The records shall be maintained in a legible, readily available condition for at least 2 years after the date testing or repair was completed.
- D. A copy of the current record of certification for each tank/account truck shall be available on each tank truck/account truck for review by air compliance inspectors.

<sup>10</sup> http://law.lis.virginia.gov/admincode/title9/agency5/chapter40/section5220/

https://www3.epa.gov/airquality/ctg\_act/197812\_voc\_epa450\_2-78-051\_tank\_trucks\_vcs.pdf

https://www3.epa.gov/ttn/emc/promgate/m-21.pdf

http://law.lis.virginia.gov/admincode/title9/agency5/chapter40/section5220/

## V. <u>Tester Approval</u>

To be approved, tanker tightness testers shall apply in writing to DEQ (note: this may be submitted electronically) using the Tanker Tightness Testing Application for Approval ("application") provided in Attachment 3 of this procedure. DEQ will provide an approval based on a review of the application and supporting documentation, an inspection of the testing facility, and an observation of the test performance. DEQ staff may use the checklist provided in Attachment 4 when evaluating a facility for approval. The observed testing shall meet the minimum requirements of Section III above. In addition, the following provisions apply:

- A. For testing facilities located outside of the Commonwealth of Virginia:
  - 1. The application shall be submitted to the Manager of the Office of Air Compliance Coordination at DEQ's Central Office<sup>14</sup> in Richmond, Virginia.
  - 2. Approval will be based on the information submitted with the application, including but not limited to:
    - Confirmation of current registration with the US Department of Transportation Federal Motor Carrier Safety Administration (USDOT FMCSA),
    - b. An approval from another State Environmental Agency that has <u>observed</u> testing performed at the facility, and/or,
    - c. Documentation by an acceptable third party observer that can confirm the facility possesses the appropriate equipment to perform Method 27 and successfully demonstrates their ability to do so. Such documentation may be the possession of a current R-Stamp<sup>15</sup> or U-Stamp<sup>16</sup>. The acceptability of the third party observer will be determined on a case-by-case basis by the DEQ.
  - 3. Approved facilities will receive and be required to keep a copy of:
    - a. The Tanker Tightness Tester Approval Letter for the approved testers. (An example Tanker Tightness Tester Approval Letter is provided as Attachment 6).
    - b. The Vapor Tightness Certification Form. (A Certification Form may not be required if approved based on having a current R-Stamp or U-Stamp.)
    - c. An optional Control Log Form provided in Attachment 2 may be enclosed to assist in tracking the trucks that were tested at the Testing Facility.
  - 4. Approval will be extended only to the expiration date of the approval received by another State's Agency, or expiration date of the R-Stamp or U-Stamp certification. For all other third party observations (excluding R-Stamp or U-Stamp holders), it shall be no more than one year from the date of the third party observation.
- B. For testing facilities located within the Commonwealth of Virginia...
  - The application shall be submitted to the Air Compliance Manager for the DEQ Region where the facility is located.
  - 2. Tester approval will be based on the information submitted with the application, and/or inspection by DEQ with observation of testing
    - DEQ inspection and observation should be at the mutual convenience of the facility and the DEQ Regional Staff.

<sup>14</sup>http://www.deq.virginia.gov/Programs/Air/PermittingCompliance/Compliance/OfficeofAirComplianceStaffContacts.aspx

http://www.nationalboard.org/index.aspx?pageID=115&ID=160

https://www.asme.org/shop/certification-accreditation/boiler-and-pressure-vessel-certification

- b. Testers shall provide DEQ Regional Staff notification no less than one week prior to the scheduled testing.
- c. Test data should be recorded on the form included in Attachment 1 (or on another form approved by DEQ with the same minimum information). The original test data form should be returned to the owner/operator of the gasoline delivery tank truck for retention with the delivery vehicle. A copy of the test data form should be maintained at the Testing Facility.
- 3. Approved facilities will receive and be required to keep a copy of the Tanker Tightness Tester Approval Letter along with the Vapor Tightness Certification Form for the approved testers, as demonstrated during observation of the test for approval. An optional Control Log Form provided in Attachment 2 may be provided to assist in tracking the trucks that were tested at the Testing Facility. An example Tanker Tightness Tester Approval Letter is provided as Attachment 5.
- 4. Approval will be extended no longer than two years from the date of the inspection and observation by DEQ, no more than one year from the date of the third party observation (excluding facilities holding a current R-Stamp or U-Stamp), or to the expiration date of the approval received by another State Agency or expiration of an R-Stamp or U-Stamp. The acceptability of the third party observer will be determined on a case-by-case basis by the DEQ.

#### C. For all testing facilities...

- Testers shall reapply to maintain approval beyond the expiration date of the previous approval, and shall do so with sufficient lead time to ensure there is no lapse in coverage.
- Approvals may be revoked at any time, and approvals are not transferable. Should any approved individual leave the employ of the facility where they were approved, that individual is required to reapply for approval. In addition, if the facility submitting the application changes ownership, the new owner is required to reapply.

### VI. Attachments

Attachment 1 - Vapor Tightness Certification Form

Attachment 2 - Control Log Form [Optional]

Attachment 3 - Tanker Tightness Tester Application for Approval

Attachment 4 - Tanker Tightness Tester Approval Checklist [Optional]

Attachment 5 – Tanker Tightness Tester Approval Letter Template

Attachment 6 - Example Tanker Tightness Tester Approval Letter

Vapor Tightness Certification Form

			Name of Certifying Facility: (please print or stamp)				Form for cargo tank truck vapor tightness testing:					
VIII.ONA DEPARTMENT OF ENVIRONMENTAL QUALITY								Air regulation fo	or vanor	tiahtne	ee: VA SAD	CB Article 4-37,
							***	40 CFR 60.505				
								63.11092(f).				
l			Tank truck (	Certification	date			1	EPA R	eferenc	e Method 2	27
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Overfil	l Protect	ion System	□ Good	☐ Faulty	□ Repair	ed		Protection System	Optic	☐ Therm	ister ☐ Othe	er .
☐ Yes			ic electrical gr	ound to tan	ık		□ Yes □ No	Temp Stabilization		ting locat	ion:	
⊔ Yes		Purged lines					⊔ Yes ∟. No	Open & Close ead				
⊔ Yes Che			compartments	of Vapor:			☐ Yes ☐ No	Connect compartr				
Meth		☐ Load of I	Non-Volatile		_				Attach test cap to vapor recovery coupling			
	2	☐ Steam cl	eaned				☐ Yes ☐ No	Connect pressure	Connect pressure-vacuum supply & pressure relief valve to shut-off valve			
		☐ Purge ea	ach compartment with air for 20 minute				☐ Yes ☐ No	Attach Manometer	r (or equiv	alent) to p	ressure tap	
							ETHOD 27 Pr					
							Vater Gauge (Mo op watch is used		starting p	ressure	(Pi) and press	ure (Pf) at the end of
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	dings hes)	Inches Water	Finishing	Time (11)	(Tf) Readings (Inches)		Inches Water	Finishing Time (Tf	' [		Inches Water	Finishing Time (Tf)
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		Pi=	Ti=		$\sqcup$		Pi=	Ti=		_	Pi=	Ti=
		a=	Tf=				Pf= b=	Tf=	4		Pf=	Tf=
To obta	in a h		e difference be	atween Pi a	nd Pf reer	nectively		1 11-11-			C=	11-11-
• A	third rur	or fourth run	are only nece	ssary if the	truck sho	uld fail	after the preced					
							an or equal to 0.: within no more t	5 inch and han allowed differenc	e from the	initial pre	essure (see tab	le above)
a-b		A	verage (a + b)	/2		(b-c)	=	Average (b + c	)/2	militar pro		
								ternal Vapor Valv				
								close all the internal value of initial time (Ti) and				
time (Tf	f) and fir	al pressure (	Pf). Test is ru	n at least 5		llowing	no more than 5	inch pressure increas	se over the			y, atom rocord initial
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3.00	3.00	6.00 Vi=	Ti=	0:00	3.00	3.00	6.00 Vi=	0:00 Ti=	3.00	3.00	6.00 Vi=	0:00 Ti=
		Vf=	Tf=				Vf=	Tf=			Vf=	Tf=
		a=	Tf-Ti =				b=	Tf-Ti =	1	-	c=	Tf-Ti =
To obta			difference be									
	<ul> <li>A third run or fourth run are only necessary if the truck should fail after the preceding run.</li> <li>the difference in two consecutive runs (a-b) or (b-c) must be less than or equal to 0.5 inch and</li> </ul>											
the average if two consecutive runs (a + b)/2 or (b+c)/2 must be no more than allowed difference from the initial pressure (see table above).												
(a-b)	=	A	verage (a + b)	/2		(b-	- c)  =	Average	e (b + c)/2			4
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Attachments:

Control Log Form [Optional]

CONTROL LOG							
Name & Address of Facility Conducting Tests: (Print Name or use stamp)							
	THE RESERVE AS A SECOND CONTRACT OF THE PARTY OF THE PART						
CARRIER NAME/OWNER & ADDRESS	TANK ID	DATE TESTED	NOTES				
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Tanker Tightness Tester Application for Approval



# Tanker Tightness Tester Application for Approval

Company	Name	(Fill	ın on	All	Pages):	

#### **PURPOSE**

The purpose of this document is to request approval from the Commonwealth of Virginia's Department of Environmental Quality (DEQ) for facility personnel to certify vapor tightness of gasoline tanker trucks in accordance with 40 CFR Part 60, Subpart A Method 27 "Vapor Tightness of Gasoline Tank-Pressure Vacuum".

See https://www.epa.gov/sites/production/files/2016-06/documents/m-27.pdf

This approval is required by 9 VAC 5 Chapter 40 Part II Article 37 "Emission Standards for Petroleum Liquid Storage and Transfer Operations" (Rule 4-37); specifically 9 VAC 5-40-5220.G.6 which states in part "...All tests shall be conducted by, or under the direction of, a person qualified by training or experience in the field of air pollution testing, or tank truck maintenance and testing and approved by the board."

See http://www.deg.virginia.gov/Portals/0/DEQ/Air/Regulations/437.pdf

Additional background and regulatory basis as well as procedures for tanker tightness testing certification can be found in Virginia DEQ's Air Standard Operating Procedure (ASOP) #5 on the Virginia Regulatory Town Hall.

See http://townhall.virginia.gov/L/ViewGDoc.cfm?gdid=2240

It is important to note any approval provided by Virginia DEQ is based on a review of the information submitted, an inspection of the testing facility, and/or an observation of the test performance, as appropriate. Approvals may be revoked at any time, and approvals are not transferable. Should any approved individual leave the employ of the facility where they were approved, that individual is required to reapply for approval. In addition, if the facility submitting the application changes ownership, the new owner is required to reapply.

#### **INSTRUCTIONS**

Complete all fields (including Company Name at the top of each page), attach appropriate documentation, certify the application, make a copy of your application and supporting documentation for your records and send to:

Air Compliance Manager for the DEQ Region the facility is located in (for facilities within Virginia).

Blue Ridge Regional Office: 3019 Peters Creek Road, Roanoke, VA 24019
 Northern Regional Office: 13901 Crown Court, Woodbridge, VA 22193
 Piedmont Regional Office: 4949-A Cox Road, Glen Allen, VA 23060

Southwest Regional Office: 355 Deadmore Street, P.O. Box 1688, Abingdon, VA 24212
 Tidewater Regional Office: 5636 Southern Boulevard, Virginia Beach, VA 23462
 Valley Regional Office: 4411 Early Road, P.O. Box 3000, Harrisonburg, VA 22801

- Manager of the Office of Air Compliance Coordination in DEQ's Central Office (for facilities outside Virginia).
  - DEQ Central Office:
     629 East Main Street, P.O. Box 1105, Richmond, VA 23219

#### **CERTIFICATIONS**

I. CERTIFICATION OF QUALIFICATIONS

"I certify that the following person(s) is/are qualified with the skills necessary to conduct and/or direct other persons to conduct testing via Method 27 of 40 CFR Part 60, Subpart A."

Qualifications are based on one or more of the following:

- a. Training in the field of air pollution testing;
- b. Experience in the field of air pollution testing;
- c. Training in the field of tank truck maintenance and testing;
- d. Experience in the field of tank truck maintenance and testing.

Name	Title	Basis (a, b, c, or d)	Experience (Years)



# **Tanker Tightness Tester Application for Approval**

Company	Name	(Fill	in on	All	Pages):	

### II. CERTIFICATION OF EQUIPMENT

"I certify that the facility described below...

- Has registered with the US Department of Transportation in accordance with 49 CFR Part 107 Subpart F; and,
- Has available the equipment necessary to perform Method 27 of 40 CFR Part 60, Subpart A."

Facility Name					
Physical Address					
Mailing Address					
Owner Name(s)					
USDOT Number					
CT (Cargo Tank) Number					
Primary Contact					
Telephone Number					
Fax Number					
Email Address					
Number of Trucks Certified Annually (Average)					
NOTE: For an application to be approved, the facility must demonstrate the facility has the necessary equipment and that the	Check <u>all</u> supporting documents provided with application:				
<ul> <li>applicable staff have training and/or experience to perform Method 27.</li> <li>For facilities located within Virginia: Please Indicate in box located to the right which documents are attached and, if necessary, schedule a site visit and test observation with the nearest DEQ Regional Office.</li> <li>For facilities located outside of Virginia: Site visits, inspections, and/or test observations are not available for facilities beyond the borders of the Commonwealth. Please be sure to provide appropriate documentation of both the inspection and the test observation by another State Environmental Agency or acceptable third party. The acceptability of the third party observer will be determined on a case-by-case basis by the DEQ</li> </ul>	<ul> <li>Most recent letter from the USDOT confirming receipt of registration application, and all registration numbers assigned to individuals, facilities, and places of business identified by the registrant. (Please be sure to redact PIN numbers)</li> <li>Approval from another State Environmental Agency for the testing facility and/or individuals testing via Method 27 of 40 CFR Part 60, Subpart A.</li> <li>Documentation and results of Method testing observed by another State Environmental Agency used to approve testing facility and/or individuals.</li> <li>Documentation of inspection by an acceptable third party to ensure the facility has the means and ability to perform Method 27 testing. (Ex. R-Stamp)</li> <li>Documentation and results of Method 27 testing observed by acceptable third party.</li> </ul>				
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."					
Name of Responsible Official*					
Title of Responsible Official					
Signature of Responsible Official					
Date					

\* As defined in 9 VAC 5-20-230. (See http://leg1.state.va.us/cgi-bin/legp504.exe?000+reg+9VAC5-20-230)

Tanker Tightness Tester Approval Checklist [Optional]

## VA DEQ TANKER TIGHTNESS TESTER APPROVAL CHECKLIST

or NO for each of the following questions as indicated. Provide an explanation in ts section if approval will not be granted.
 Signed application received?
 Application form completed?
 Application certified by Responsible Official?
 Supporting documents provided?
 USDOT Registration confirmed online by DEQ staff? ( <a href="http://mcmis.volpe.dot.gov/mcs150t/pkg">http://mcmis.volpe.dot.gov/mcs150t/pkg</a> ct public.prc ct public search)
 Was the facility inspected by one of the following? (mark all that apply to this application):
Virginia DEQ
Another State Environmental Agency
An acceptable Third Party
Was Method 27 testing observed by one of the following? (mark all that apply to this application):
Virginia DEQ
Another State Environmental Agency
An acceptable Third Party (R-Stamp and U-Stamp facilities are not required to submit a Method 27)
 Test results demonstrate Method 27 used?
 Test performed at 18inH2O pressure and 6inH2O vacuum?
 Test performed for at least 5 minutes?
 Application approved? (Expiration Date:)

COMMENTS:

Tanker Tightness Tester Approval Letter Template

## Letterhead

Note: Items in [brackets] are ones to be selected.

Month XX, 201X

[Mr. or Ms.] Responsible/Certifying Official Title, Name of Facility Mailing Address City, State XXXXX

RE: Tanker Tightness Testers and Testing Facility USDOT#XXXXXXX CT#XXXXX

[Mr. or Ms.] Responsible/Certifying Official:

The Virginia Department of Environmental Quality (DEQ) received your Tanker Tightness Tester – application for approval by US Mail [or by e-mail] on XX/XX/201X.

Based on [DEQ staff's observation of a vapor tightness test conducted on a gasoline delivery tank truck], the review of your application and supporting documentation provided therein, your facility located at <a href="Physical Address">Physical Address</a>, <a href="City">City</a>, <a href="State Zip Code">State Zip Code</a> and the individual (or those individuals) specifically named in your application (<a href="Name and Name">Name</a>) are approved to conduct and/or supervise vapor tightness testing for gasoline tank trucks in accordance with 9 VAC 5 Chapter 40 Part II Article 37 "Emission Standard for Petroleum Liquid Storage and Transfer Operations".

- 1. The approval is extended only to the facility and individual(s) listed above and those working under his or her supervision at the facility.
- 2. This approval is non-transferrable. Should the individual(s) listed above leave the employ of your facility they are required to reapply for approval by Virginia DEQ.
- This approval may be revoked if it is found that your facility is fraudulently certifying trucks as vapor tight that do not meet the definition in 9VAC5-40-5210C or if your facility fails to maintain and update its USDOT and related CT registration requirements.

#### (For facilities inspected/observed by DEQ staff):

4. [Unless otherwise revoked, this approval remains in effect two years from the date of this approval letter.]

Or

(For facilities inspected/observed by another State Agency, by the National Board of Boiler & Pressure Vessel Inspectors, or by an acceptable third party):

4. [Unless otherwise revoked, this approval remains in effect until Month XX, 201X, which corresponds with select only one [the expiration of State Agency's certification] or [the expiration of Certificate Number XXXX for R-Stamp or U-Stamp issued to your facility by the National Board of Boiler & Pressure Vessel Inspectors] or 1 year from the date of the inspection/observation by (acceptable third party).]

[Mr. or Ms.] Responsible/Certifying Official Name of Facility Month Date, 201X Page X

5. It is recommended that you reapply before this expiration date to ensure no lapse in coverage.

[As an Official Test Station, please use a Vapor Tightness Certification Form and a Control Log Form. The Control Log Form is to be maintained at the Test Station along with a copy of the Certification Form. The original Certification Form is returned to the owner/operator for retention with the delivery vehicle along with a copy of this letter.]

If you have any questions or require additional information, please do not hesitate to contact me at (XXX) XXX-XXXX or email me at (Your E-Mail here)@deq.virginia.gov.

Respectfully,

#### (YOUR NAME)

Virginia Department of Environmental Quality

[For out of State Testers': Office of Air Compliance Coordination]

or

[For in State Testers' Approved by Regions: Air Compliance Inspector

or

Air Compliance Manager

[Cc] or [Ec]: State Agency Contact Name - State Agency

or

[Cc] or [Ec]: Third Party Contact Name - Third Party Company Name

[Attachments]

[Vapor Tightness Certification Form]
[Control Log Form]

Example Tanker Tightness Tester Approval Letter Template

## VADEQ Letterhead

April 23, 2017

Mr. John Tester President, J.T. Tanker Tightness Testing Facility 123 Main Street Somewhere, VA 23000

RE: J.T. Tanker Tightness Testing Facility USDOT#1234567 CT#1234

Dear Mr. Tester:

The Virginia Department of Environmental Quality (DEQ) received your Tanker Tightness Tester – application for approval by e-mail on 4/21/2017.

Based on the review of your application and supporting documentation provided therein, your facility located at J.T. Tanker Testing Facility, Somewhere, VA 23000 and those individuals specifically named in your application (Jack Tester and Jane Tester) are approved to conduct and/or supervise vapor tightness testing for gasoline tank trucks in accordance with 9 VAC 5 Chapter 40 Part II Article 37 "Emission Standard for Petroleum Liquid Storage and Transfer Operations".

- 1. The approval is extended only to the facility and individual(s) listed above and those working under his or her supervision at the facility.
- 2. This approval is non-transferrable. Should the individual(s) listed above leave the employ of your facility they are required to reapply for approval by Virginia DEQ.
- This approval may be revoked if it is found that your facility is fraudulently certifying trucks as vapor tight that do not meet the definition in 9VAC5-40-5210C or if your facility fails to maintain and update its USDOT and related CT registration requirements.
- 4. Unless otherwise revoked, this approval remains in effect until March 8, 2018, which corresponds with NCDENR's certification.
- 5. It is recommended that you reapply before this expiration date to ensure no lapse in coverage.

If you have any questions or require additional information, please do not hesitate to contact me at (804) 123-4567 or email me at John.Compliance@deq.virginia.gov.

Respectfully,

John Compliance
Virginia Department of Environmental Quality

Ec: Carolyn Approver – NCDENR